

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DEBORAH BELLE,)
Individually, and on behalf)
of all others similarly situated,)
)
Plaintiffs,)
)
v.)
)
NCO FINANCIAL SYSTEMS, INC.,)
A Pennsylvania Corporation)
)
Suite 210)
891 Elkridge Landing Road)
Lintchcum, Maryland 21090)
)
and)
)
JOHN DOE)
)
Defendants.)

**MOTION FOR PARTIAL SUMMARY JUDGMENT/DISMISSAL
AND AWARD OF COSTS AND ATTORNEYS' FEES**

Defendant NCO Financial Systems, Inc., through its counsel, hereby moves for partial summary judgment/dismissal of the class claims presented in Count I of the Complaint filed by the Plaintiff, Deborah Belle. As set forth more thoroughly in the Memorandum of Law in Support of this Motion, because the class allegations are insupportable as a matter of law and the Court-imposed deadline for plaintiff to move to certify the class has expired, partial summary judgment or dismissal of Count I is proper under Rules 56 and 41(b) of the Federal Rules of Civil Procedure. Additionally, pursuant to either or both 15 U.S.C. §1692k(a)(3) and 28 U.S.C. § 1927, NCO requests the

Court award its costs and attorneys' fees in defending the class claims. The Defendant incorporates herein its Memorandum of Law in Support of its Motion for Partial Summary Judgment/Dismissal and Award of Costs and Attorneys' Fees.

Respectfully submitted,

/s/

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